

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CARLOS O. NESBETH, AMIT)
GODAMBE, JENNY GALLERY,)
MISTY HOWELL and MICAH)
WEBB, individually and on behalf of) **CIVIL ACTION NO.:**
all others similarly situated,) **2:21-cv-01444-PD**
)
Plaintiffs,)
)
)
v.)
)
ICON CLINICAL RESEARCH, LLC,)
THE BOARD OF DIRECTORS OF)
ICON CLINICAL RESEARCH, LLC,)
THE 401(K) PLAN COMMITTEE)
OF ICON CLINICAL RESEARCH,)
LLC and JOHN DOES 1-30.)

Defendants.

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES AND A LEAD PLAINTIFF
CASE CONTRIBUTION AWARD**

Named Plaintiffs Carlos O. Nesbeth, Amit Godambe, Jenny Gallery, Misty Howell and Micah Webb (collectively, "Plaintiffs"), participants in the ICON Clinical Research, LLC 401(k) Plan (the "Plan") hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting class counsel attorneys' fees in the amount of \$316,635.00 which represents 33 1/3% of the settlement amount;

2. Directing reimbursement to Class Counsel in the amount of \$14,882.60 of expenses incurred in the prosecution of the action;
3. Awarding case contribution award of \$10,000.00 to each of the five Named Plaintiffs (Carlos O. Nesbeth, Amit Godambe, Jenny Gallery, Misty Howell and Micah Webb); and
4. For such other relief as the Court may deem just and proper.

A proposed form of Order is submitted hereto.

The grounds for this Motion are set forth in the following documents filed contemporaneously herewith:

- A. Memorandum of Law in Support of Plaintiffs' Motion For Award of Attorneys' Fees and Expenses, and Case Contribution Awards;
- B. Declaration of Mark K. Gyandoh in Support of Plaintiffs' Motion for Final Approval of Settlement and In Support of Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards for the Class Representatives;
- C. Declaration of Named Plaintiff Carlos O. Nesbeth In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs;

D. Declaration of Named Plaintiff Amit Godambe In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs;

E. Declaration of Named Plaintiff Jenny Gallery In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs;

F. Declaration of Named Plaintiff Misty Howell In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs.; and

G. Declaration of Named Plaintiff Micah Webb In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs.

Dated: May 12, 2022 Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh

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Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2022, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: Mark K. Gyandoh
Mark K. Gyandoh, Esq.